

1 GOLD BENNETT CERA & SIDENER LLP
Solomon B. Cera (SBN 99467)
2 Thomas C. Bright (SBN 169713)
595 Market Street, Suite 2300
3 San Francisco, California 94105
Telephone: (415) 777-2230
4 Facsimile: (415) 777-5189
scera@gbcslaw.com
5 tbright@gbcslaw.com

6 Attorneys for Lead Plaintiff

7
8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA

10 GARY REDWEN, Individually And On
11 Behalf Of All Others Similarly Situated,

12 Plaintiffs,

13
14 v.

15 SINO CLEAN ENERGY, INC.,
16 BAOWEN REN, WEN FU, HON WAN
17 CHAN, PENG ZHOU, WENJIE
18 ZHANG, ALBERT CHING-HWA PU,
and ZIDONG CAO,

19 Defendants.
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Case No.: 11-CV-03936 PA (SSx)

**DECLARATION OF
BRUCE H. COZZI**

Hearing Date: July 1, 2013
Time: 1:30 p.m.
Courtroom: 15

1 I, Bruce H. Cozzi, declare:

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3 1. I am the Fund Controller at Gilardi & Co. LLC (“Gilardi”). Gilardi
4 was retained and appointed to act as the claims administrator in this matter. I
5 submit this declaration at the request of Lead Plaintiff’s Counsel in order to
6 provide the Court and the parties to the above-captioned litigation with information
7 regarding the use of minimum check amounts in this and other settlement
8 administrations. I have personal knowledge of the matters set forth in this declaration
9 and I could competently testify as to those matters if called to do so.

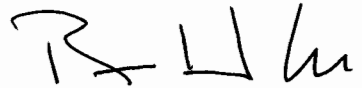
10 2. By way of background, Gilardi is one of the nation’s largest
11 administrators of class action notices and settlements. For more than a quarter-
12 century, Gilardi has provided class action notice and settlement administration,
13 with more than 3,000 cases administered and \$20 billion in assets distributed.
14 Gilardi’s experience includes many of the largest and most complex settlement
15 administrations of both private class litigation and of actions brought by
16 government securities regulators.

17 3. I am informed that a potential class member objects to the planned
18 use in this case of a minimum check amount when the proposed settlement fund is
19 distributed to settlement class members. In our experience, such minimum check
20 amounts are commonly used in distributions from private securities litigation
21 settlement funds as well as funds resulting from government enforcement actions,
22 such as those brought by the Securities and Exchange Commission. Indeed, over
23 the past three years, we have done at least 30 distributions in which a minimum
24 check amount was established.

25 4. The use of minimum check amounts is intended to address the
26 potentially disproportionate administrative expense to the fund associated with issuing
27 very small checks to investors. Every check that is issued in a case like this one
28 represents an expense that is borne by the settlement fund, and therefore ultimately by

1 class members. Besides the cost to print and mail a check, the administrator must also
2 track and account for each payment as it is negotiated, or, as is frequently the case
3 with very small payments, not negotiated. At Gilardi, we routinely follow-up on
4 uncashed checks by mail, email and telephone, all of which create administrative
5 expenses. In our experience, very small checks are often not cashed initially, and in
6 many cases are never cashed. Moreover, because many small checks are not cashed
7 during their initial valid period, they occasionally need to be, and are subsequently
8 reissued, at the request of the recipient, at additional expense.

9 5. I declare under penalty of perjury that the foregoing is true and
10 correct and that this declaration was executed this 21st day of June, 2013, at San
11 Rafael, California.

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15 Bruce H. Cozzi
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CERTIFICATE OF SERVICE

I hereby certify that on June 21, 2013, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record in this action.

I hereby certify that on June 21, 2013, I also served a true and correct copy of the foregoing by placing a true and correct copy enclosed in a sealed envelope for collection and deposited in the U.S. Mail, postage prepaid, on this date following ordinary business practices addressed as follows:

Larry Vincent
c/o Gary W. Sibley
The Sibley Firm
2602 McKinney Avenue, Suite 210
Dallas, TX 75204
(214) 522-5222
(214) 855-7878 (Fax)

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on June 21, 2013.

s/Thomas C. Bright
Thomas C. Bright